

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Ann L. Pierce

Chapter: 13

Bankruptcy No.: 19-17288-pmm

Debtor

11 U.S.C. § 362

U.S. Bank Trust National Association, not in its
individual capacity but solely as owner trustee for
Loan Acquisition Trust 2017-RPL1

Movant

vs.

Ann L. Pierce

Debtor

and

Scott F. Waterman, Esquire

Trustee

RESPONDENTS

**PRAECIPE TO WITHDRAW Certification of Default of Stipulation FROM THE
AUTOMATIC STAY, Doc 76**

**TO THE CLERK OF THE UNITED STATES BANKRUPTCY COURT,
EASTERN DISTRICT OF PENNSYLVANIA**

Kindly withdraw the Movant's Certification of Default of Stipulation in the above captioned matter.

Respectfully submitted,

/s/ Michael Clark

Richard M. Squire, Esq.

M. Troy Freedman, Esq.

Michael J. Clark, Esq.

One Jenkintown Station, Suite 104

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Jenkintown, PA 19046

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Dated: March 18, 2021

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CERTIFICATE OF SERVICE

I hereby certify that I am over 18 years of age; and that service upon all interested parties, indicated below, was made by sending true and correct copies of the Praeipue to Withdraw Certification of Default of Stipulation from U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Loan Acquisition Trust 2017-RPL1 electronically and/or via First Class Mail, postage prepaid.

Date Served: March 18, 2021

Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106

Ann L. Pierce
2148 Butler Street
Easton, PA 18042

David S. Gellert, Esquire
1244 W. Hamilton Street
Suite 204
Allentown, PA 18102

I hereby certify the foregoing to be true and correct under penalty of perjury.

Respectfully submitted,

/s/ Michael Clark

Richard M. Squire, Esq.

M. Troy Freedman, Esq.

Michael J. Clark, Esq.

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Attorney for Movant